

**BEST AVAILABLE COPY**Remarks

A replacement paragraph for the "Related Applications" section of the Specification is submitted to add the application numbers for the related applications.

Applicants acknowledge the Examiner's allowance of claims 21-36 and the indicated allowance of claims 15 and 16 if amended to be in independent form and to include the limitations of the base claim and any intervening claims.

All claims 1-36 remain. None of the claims 1-20 have been amended, for the reasons indicated below.

Independent claim 1 has been rejected under Section 103(a) over US 5,820,769 (Chou) in view of US 6,660,357 B1 (Litvinov et al.) and further in view of US 2004/0080847 A1 (Lundstrom). However, Applicants believe that a *prima facie* case of obviousness has not been established because Litvinov does not teach that for which it is asserted. As stated in paragraph 3 of the office action:

"Chou fails to particularly disclose that each island comprising at least two stacked magnetic cells and being separated from the other cells in its island. However, Litvinov et al. discloses such (as depicted in FIG. 4, abstract)."

Fig. 4 of Litvinov is a sectional view of layer 14, which is the soft magnetic underlayer that is used as the flux return path of the perpendicular magnetic recording disk 10. This is shown in Fig. 1 of Litvinov, where the disk 10 includes the perpendicular magnetic recording layer 16 formed on the soft magnetic underlayer 14, and in Fig. 2, where just the soft magnetic underlayer 14 is shown in a more detailed view. The soft magnetic underlayer 14 is formed of material that has no remanent magnetic moment (no moment in the absence of an applied magnetic field), and thus can not function to store magnetically recorded data. Layer 14 of Litvinov is thus like the underlayer claimed in Applicants' dependent claim 18. Thus it can not function as the "stacked magnetic cells ... having perpendicular magnetic anisotropy" as

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required by Applicants' claim 1. In addition, the typical regions 30a, 32a in Fig. 4 of Litvinov do not represent "cells" in "islands" but rather sectional views of two layers in an annular band 32a (Fig. 3).

Thus Applicants' believe that a *prima facie* case of obviousness has not been established, that the rejection of claim 1 should be withdrawn, and that accordingly claims 1-20 are allowable.

The Examiner is invited to call Applicants' attorney if a telephone conference will expedite the prosecution of this application.

Respectfully submitted,

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